

# EXHIBIT L

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK  
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DARCY M. BLACK,

Plaintiff,

-vs-

BUFFALO MEAT SERVICE, INC., doing business  
as BOULEVARD BLACK ANGUS, also known as  
BLACK ANGUS MEATS, also known as  
BLACK ANGUS MEATS & SEAFOOD,  
ROBERT SEIBERT,  
DIANE SEIBERT,  
KEEGAN ROBERTS,

Defendants.  
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Examination Before Trial of  
  
SEAN ROUND, taken pursuant to the Federal Rules of Civil  
Procedure, in the law offices of GRECO TRAPP, PLLC, 1700  
Rand Building, 14 Lafayette Square, Buffalo, New York,  
taken on November 20, 2017, commencing at 9:07 A.M., before  
MARY ANN MORETTA, Notary Public.

1 BY MS. GRECO:

2 Q. I'll be specific. Do you know what derogatory  
3 means?

4 A. Yes.

5 Q. What does it mean?

6 A. Webster's definition, probably not.  
7 Inappropriate things, vulgar language.

8 Q. Did you ever hear the word nigger used in the  
9 workplace?

10 A. No.

11 Q. Did you ever hear the word nigs used?

12 A. No.

13 Q. Did you ever hear Bob's nigs used?

14 A. No.

15 Q. Did you ever hear spear chucker used?

16 A. No.

17 Q. Did you ever hear boonie used?

18 A. No.

19 Q. Did you ever hear jungle bunny used?

20 A. No.

21 Q. Did you ever hear monkey used?

22 A. No.

23 Q. Did you ever hear ape used?

1        dating a black man?

2        A.    She dated quite a few in my tenure there --

3        Q.    Okay.

4        A.    -- so yes, I was aware.

5        Q.    Okay.    And how did you become aware that she was  
6        dating black men?

7        A.    She would talk about it.

8        Q.    Okay.    And did any of the individuals that she  
9        dated that were black come into the store?

10       A.    I think so.

11       Q.    And did you ever discuss with her her dating a  
12       black man?

13       A.    No.

14       Q.    Did you ever hear anyone refer to Darcy's  
15       children -- strike that.    Were you aware -- did  
16       you ever become aware that Darcy Black's  
17       children's father was African-American?

18       A.    Yes.

19       Q.    How did you become aware of that?

20       A.    I deduced it on my own after I met the kids.

21       Q.    Did you ever hear anyone refer to Darcy's  
22       children as niggers?

23       A.    No.